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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 J.C.O.C. on his behalf and on behalf of his) Case No. 3:23-cv-5268-SI
14 minor child, M.M.O.S.,)
15 Plaintiffs,) **JOINT NOTICE OF CONDITIONAL
16 v.) SETTLEMENT AND REQUEST TO STAY
17 UNITED STATES OF AMERICA,) LITIGATION DEADLINES
18 Defendant.)
19 _____)**

20 The parties, by and through undersigned counsel, hereby notify the Court that the parties have
21 reached a conditional settlement in this action under the Federal Tort Claims Act, 28 U.S.C. § 2671, et
22 seq. and stipulate and respectfully request that all current deadlines be vacated and the action be stayed,
23 based on the following:

24 1. The parties have reached a conditional settlement of all claims in this litigation, subject to
25 the approval of the settlement of the minor's claims by a court of competent jurisdiction, which may
26 take some time, to be followed by the approval of the Attorney General of the United States or his
27 designee.

28 2. Absent a stay pending finalization of the settlement, litigation burden and expense will be

incurred that are to be made unnecessary by the pending settlements.

3. The parties stipulate to file a joint status report every 60 days during the stay to keep the Court apprised of the progress of the pending settlement. It is anticipated that, once the settlement is completed, the parties will file a stipulation for dismissal of all claims.

Therefore, in the interest of judicial economy and efficiency, and to preserve the benefit of the pending settlement, the parties stipulate and respectfully request that the Court enter an order vacating all current deadlines and staying this action pending further stipulation or motion of the parties or Order of the Court.

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

Dated: April 10, 2024

By: /s/ Michael A. Keough
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*Assistant United States Attorneys
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s/ Yan-Xin Li*
YAN-XIN LI

Attorney for Plaintiffs

** In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED that because the parties have reached a conditional settlement of all claims in this litigation, subject to the Court's approval of the settlement of the minor's claims:

1. All present deadlines are hereby vacated.
 2. This action is stayed pending further stipulation or motion of the parties or Order of the

Court.

3. The parties shall file a joint status report within sixty (60) days of the entry of this Order, and every sixty (60) days thereafter, in which they shall keep the Court apprised of the progress of the pending settlement.

Dated:

UNITED STATES DISTRICT JUDGE